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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17 UNITED STATES OF AMERICA,
18
19 Plaintiff,
20
21 v.
22
23 CHASE MCMILLON,
24
25 Defendant.

Case No. 4:22-CR-0054-JSW
Case No. 4:14-CR-0353-JSW

**STIPULATION TO MODIFY
DEFENDANT MCMILLON'S
PRETRIAL RELEASE AND
SUPERVISED RELEASE CONDITIONS
AND ~~[PROPOSED]~~ ORDER**

26 Following a jury's acquittal of Defendant Chase McMillon in case number 20-CR-242-JSW, the
27 parties stipulated to Mr. McMillon's release from custody in the instant case pursuant to a set of pre-trial
28 bond and supervised release conditions, and the Court ordered release. *See* No. 4:22-cr-0054-JSW, Dkt.

No. 7. Per the order setting conditions (and with the agreement of Pretrial Services and the Probation Office), supervision has been implemented by the Probation Office so as not to duplicate supervision.

Among the pretrial and supervised release conditions is the requirement that Mr. McMillon submit to location monitoring, with curfew hours to be adjusted at the discretion of the Probation Office. *Id.*

It is hereby stipulated by and between counsel for Mr. McMillon and the government (with the Probation Office indicating that they take no position on this request), to modify his pretrial release and supervised release conditions to modify the condition of electronic monitoring as follows:

Mr. McMillon must participate in the Location Monitoring Program as directed by the probation officer for a period of 12 months,¹ and be monitored by Location monitoring technology at the discretion of the probation officer. Location monitoring fees are waived.

Additionally, Mr. McMillon will be prohibited from traveling to or through the following geographic locations:

1. The area in Oakland bounded by 5th Avenue, Foothill Boulevard, and 35th Avenue, and East 12th Street;

2. The area in Richmond bounded by 20th Street, Rheem Avenue, 26th Street, and Downer Avenue (east of 23rd Street)/Burbeck Avenue (west of 23rd Street);

3. The area in San Francisco bounded by 16th Street, Bryant Street, 21st Street, and Mission Street; and

4. The area in San Jose bounded by Virginia Street, South 5th Street, Keyes Street, and Almaden Avenue.

Mr. McMillon's presence in these areas would be a violation of the terms of his release.

IT IS SO STIPULATED.

¹ This 12-month period began on April 1, 2022, the date the Conditions of Release and Appearance became effective. *See* No. 4:22-cr-0054-JSW, Dkt. No. 7.

DATED: September 26, 2022

MOEEL LAH FAKHOURY LLP

/s/ Shaffy Moeel

Shaffy Moeel
Mark R. Vermeulen
Attorneys for Mr. McMillon

DATED: September 26, 2022

STEPHANIE HINDS

UNITED STATES ATTORNEY

/s/

Jonathan Lee
Assistant United States Attorney

1 ~~[PROPOSED]~~ ORDER

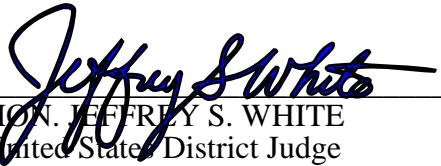
2 Based upon the record in this case and the facts set forth in the above stipulation ,

3 IT IS HEREBY ORDERED that Mr. McMillon's conditions of pretrial release and supervised
4 release shall be modified as requested above.

5 Except as modified herein, the conditions of pretrial release and supervised release shall remain
6 in full force and effect.

7 IT IS SO ORDERED.

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10 DATED: September 26, 2022

11 
12 HON. JEFFREY S. WHITE
13 United States District Judge
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